Thank you for the opportunity to comment on the draft Industrial Stormwater General Permit dated March 27, 2002. Our comments are divided into "general comments" and "suggestions for improvement."

General comments

In general, the Action Team staff congratulate the department for its work in developing the draft permit. We believe the draft represents a significant improvement over the previous permit. We specifically support:

- The requirement for periodic monitoring for several parameters and additional monitoring for specific industries.
- Statements that discharges must not cause or contribute to excursions from state water quality standards.
- The requirement for discharges to 303(d) listed waterbodies to meet water quality standards for the parameter of concern at the point of discharge.
- The inclusion of monitoring protocols; we believe that they should help ensure quality assurance and control.
- The requirement for record keeping, development of a Stormwater Pollution Prevention Plan (SWPPP) and operation and maintenance.
- The requirement that permittees use the Stormwater Management Manual for Western Washington.
- The requirement that the SWPPP include specific operational and structural source control and treatment BMPs.

Suggestions for improvement

- We suggest that the permit clearly state in S3E that Ecology shall approve the use of mixing zones for monitoring. This should not be a decision left entirely up to the permittee. There may be waterbodies or industries for which mixing zones are not suitable without jeopardizing the waters of the state.
- If monitoring is suspended due to no exceedances for eight quarters (S4), we suggest that there be a requirement for periodic "check-in" samples to ensure that exceedances do not occur. Requiring no additional monitoring for the remainder of the permit could result in several years of contamination to a water body. Annual check-in sampling may be a reasonable time period.
- We suggest that Ecology formally grant "no exposure" certificates to permittees, rather than it being an automatic designation unless Ecology responds in writing (S6). It is possible that a permittee that should be covered might "fall through the cracks," especially given the number of permittees. This could be done simply by a form letter.
- We suggest that under Appendix #2 Definitions, Ecology clearly state that for industrial facilities in western Washington the applicable manual that must be used is the Stormwater Management Manual for Western Washington, August 2001. Currently the language in this section is unclear. It is much more clear in S9.

Thank you for the opportunity to comment on the draft permit.